

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

LEGRETTA F. CHEEK,

Plaintiff,

v.

BANK OF AMERICA, N.A.; JOHN DOE;
GURSTEL LAW FIRM, P.C.; WHITNEY
M. JACOBSON; JESSE VASSALLO
LOPEZ; BROCK & SCOTT, PLLC;
BIRSHARI COOPER,

Defendants.

CASE NO.: 3:20-CV-00182-RJC

**DEFENDANTS BROCK & SCOTT, PLLC AND BIRSHARI COOPER'S
MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendants Brock and Scott, PLLC, and Birshari Cooper, by and through their undersigned counsel, respectfully move the Court, pursuant to Fed. R. Civ. P. 6(b), for a thirty (30) day extension of time to respond to Plaintiff's Complaint, through and including May 18, 2020. In support of this motion, Defendants Brock & Scott, PLLC and Birshari Cooper state as follows:

1. Plaintiff initiated this action by filing a Complaint on March 23, 2020.
2. Defendant Brock and Scott, PLLC, was served with Plaintiff's Complaint on March 26, 2020, and the time for responding has not expired.
3. Defendant Birshari Cooper has yet to be served with Plaintiff's Complaint, and thus the time for responding has not expired.
4. Brock and Scott, PLLC and Birshari Cooper, will need more time to investigate and respond to Plaintiff's allegations set forth in the Complaint and to prepare a responsive pleading.
5. This Motion is made in good faith and not for the purpose of undue delay.

WHEREFORE, Defendants Brock and Scott, PLLC, and Birshari Cooper respectfully request that the Court allow an additional thirty (30) days to respond to the Complaint, up to and including May 18, 2020.

Respectfully submitted this 13th day of April, 2020.

/s/ Alan M. Presel

Alan M. Presel, NC Bar #24470

BROCK & SCOTT, PLLC

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*Attorneys for Defendants Brock & Scott, PLLC
and Birshari Cooper*

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CERTIFICATE OF SERVICE

This is to certify that on this date the undersigned has electronically filed the foregoing **Motion for Extension of Time** with the Clerk of Court using the CM/ECF system. This is to further certify that on this date the undersigned has served, or caused to be served, the foregoing upon *pro se* Plaintiff by placing a copy of the same in a postage paid envelope addressed to the person hereafter named, return address clearly indicated, to the place and address stated below, which is the last known address, and by depositing said envelope in the U.S. Mail:

LeGretta F. Cheek
113 Indian Trail Rd N, Suite 100
Indian Trail, NC 28079
Pro Se Plaintiff

This 13th day of April, 2020.

/s/ Alan M. Presel

Alan M. Presel, NC Bar #24470
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*Attorneys for Defendants Brock & Scott, PLLC
and Birshari Cooper*